

THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

H.B.,	)	CIVIL ACTION FILE
	)	
Plaintiffs,	)	NO. 1:22-CV-01181-JPB
	)	
v.	)	
	)	
RED ROOF INNS, INC., et al.,	)	
	)	
Defendants.	)	

**DEFENDANTS' EXPERT DISCLOSURE**

Pursuant to Rule 26(a)(2)(A) of the Federal Rules of Civil Procedure, Defendants Red Roof Inns, Inc., FMW RRI I, LLC, and RRI West Management, LLC submit the following names of the expert witnesses they anticipate calling to testify at trial to provide expert testimony in their respective fields.

**RETAINED EXPERTS**

1. *Greg Bristol*  
Criminality & Law Enforcement Expert  
BREAK THE CHAIN LLC  
15920 Fairway Drive  
Dumfries, Virginia 22025  
(304) 492-5855
2. *Kimberly Mehlman-Orozco, Ph.D.*  
Human Trafficking Expert  
BREAK THE CHAIN LLC  
15920 Fairway Drive  
Dumfries, Virginia 22025  
(703) 362-9405

3. *Matthew Norman, M.D.*  
Board-certified Psychiatrist  
4401 Northside Pkwy NW, Suite 245  
Atlanta, Georgia 30327  
(404) 495-5900
4. *Michael Seid*  
Franchise Expert  
MSA WORLDWIDE  
94 Mohegan Drive  
West Hartford, Connecticut 06117  
(869) 523-4257

The reports of the above-mentioned experts, pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, are being served on Plaintiff in accordance with this Court's Amended Scheduling Order.

This 26th day of July, 2023.

Respectfully submitted,

TUCKER ELLIS LLP  
950 Main Avenue, Suite 1100  
Cleveland, OH 44113-7213  
Telephone: 216.592-5000  
Facsimile: 216.592-5009  
[sandra.wunderlich@tuckerellis.com](mailto:sandra.wunderlich@tuckerellis.com)  
[chelsea.mikula@tuckerellis.com](mailto:chelsea.mikula@tuckerellis.com)  
[ashley.saferight@tuckerellis.com](mailto:ashley.saferight@tuckerellis.com)

/s/ Sandra J. Wunderlich  
Sandra J. Wunderlich (*admitted pro hac vice*)  
Chelsea Mikula (*admitted pro hac vice*)  
C. Ashley Saferight (*admitted pro hac vice*)

GREENBERG TRAURIG LLP  
Terminus 200  
3333 Piedmont Road NE, Suite 2500  
Atlanta, GA 30305  
Telephone: 678.553.2100  
[duccam@gtlaw.com](mailto:duccam@gtlaw.com)  
[coxb@gtlaw.com](mailto:coxb@gtlaw.com)

Marcella C. Ducca  
Ga Bar No. 115079  
Brandon D. Cox  
Ga Bar No. 832025

*Attorneys for Defendants Red Roof Inns, Inc.,  
FMW RRI I, LLC, and RRI West  
Management, LLC*

**RULE 7.1D CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D) of the United States District Court of the Northern District of Georgia, the undersigned certifies that the foregoing submission to the Court was computer-processed, double-spaced between lines, and used Times New Roman font of 14-point size.

Dated: July 26, 2023

/s/ Sandra J. Wunderlich

Sandra J. Wunderlich

*One of the Attorneys for Defendants Red  
Roof Inns, Inc., FMW RRI I, LLC, and  
RRI West Management, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 26, 2023, *Defendants' Expert Disclosure* was filed electronically. Service of this filing will be made pursuant to Civ. R. 5(b)(2)(e) by operation of this Court's electronic filing system. Parties may access the filing through the Court's system.

/s/ Sandra J. Wunderlich

Sandra J. Wunderlich

*One of the Attorneys for Defendants Red  
Roof Inns, Inc., FMW RRI I, LLC, and  
RRI West Management, LLC*